

File: Martha C. Rose Chemical Plant  
Johnson County

JOHN ASHCROFT  
Governor

G. TRACY MEHAN III  
Director



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JUN 13 1991  
REML SECTION

Division of Energy  
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Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176  
Jefferson City, MO 65102

Site:	Martha Rose
ID#:	MOD980633069
Break:	5.7
Other:	
	6-11-91

June 11, 1991

Mr. Steven E. Kinser  
U.S. Environmental Protection  
Agency, Region VII  
726 Minnesota Avenue  
Kansas City, KS 66101

RE: Comments on the Draft Proposed Plan for the Martha C. Rose Site,  
Holden, Missouri

Dear Mr. Kinser:

Review of the "final" draft Proposed Plan (dated May 14, 1991) has been completed by the Missouri Department of Natural Resources (MDNR). Staff from the Division of Geology and Land Survey, the Division of Environmental Quality's Waste Management and Laboratory Services Programs, and the Missouri Department of Health (MDOH) conducted the review. The State has identified some areas of major concern and offer the following comments for your consideration:

1. Although it is well established that all commercial PCB mixtures are potentially contaminated with dibenzofurans, the sampling at this site did not include analysis for dioxins or dibenzofurans. Therefore, the Endangerment Assessment performed at this site did not include them as indicator chemicals. Because of this oversight, the assumptions made in the RI/FS may not be valid and the health risks associated with this site may be several orders of magnitude higher than those given in the RI/FS. We feel that the U. S. Environmental Protection Agency (EPA) should take the possibility of extensive dibenzofuran contamination into consideration when deciding what levels of waste to incinerate/remove. It is likely that the soils/concrete with the highest levels of PCB contamination also contain the highest levels of dibenzofurans. We feel that all soils above 100 parts per million (ppm) and all concrete contaminated above 500 ppm should be incinerated.



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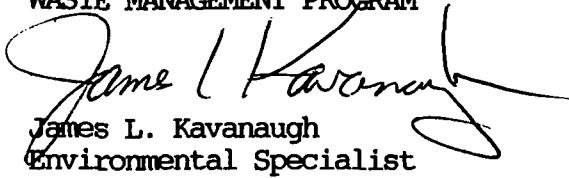
2. The proposed interval for groundwater monitoring calls for yearly sampling. We feel this is too long of an interval, especially in the first few years. We recommend quarterly sampling for the first two or three years. This would further prove the assertion that the original two or three sampling rounds were influenced by surface dust. These first few years of quarterly sampling would also detect any migration of contaminants that may have occurred since the RI sampling in 1989 and 1990. Two or three years of quarterly sampling data will pick up any seasonal changes that may occur and show any trends that may influence migration potential. If such migration exists, the contingency plan could be implemented early in the remedial action phase, if need be.
3. The plan calls for cleaning the stream sediment to .18 ppm PCBs. What level will VOCs be cleaned up to? Since different stretches of the streams may be contaminated with different compounds (PCBs versus VOCs) the verification samples should be analyzed for both.
4. On pages 17 and 18, the plan calls for "all soil contaminated at levels significantly above 100 ppm will be incinerated." The plan does not define "significantly above?" We feel all soils contaminated above 100 ppm should be incinerated.
5. On page 17, the plan states, "It is not anticipated that any sediment will exceed 100 ppm;" however, no provisions are included as to what step(s) will be taken should the 100 ppm level be exceeded.
6. The plan calls for a 10-inch cap for the site. We are particularly concerned with this because the proposed plan only addresses "Deed restrictions prohibiting conventional residential structures." Any residential structure, whether conventional or otherwise, is likely to result in soil excavation for water lines and grading of soil for roads, curbs, and drainage ditches, etc. We would be more comfortable with a thicker cap on this site and/or deed restrictions which prevent all residential structures.
7. On page 6, the plan states, "There are existing wells in the area, but are not currently in use due to the low yield of the groundwater. It has been reported that some of these wells are being plugged by their owners." These wells represent potential sources of human exposure as long as they remain open, even if they are not currently being used. It might be prudent to initiate provisions to assist existing private well-owners in the area of the Martha Rose Chemical site in plugging those wells. Proper closure of these existing wells would remove the temptation of future use and in turn reduce the potential for exposure from the groundwater pathway.
8. On page 18, under paragraph C, in the last sentence, there is a typo, "manor" should be manner. Also on page 21, in the last paragraph, third sentence, the word "waver" should be spelled waiver.

Mr. Steve Kinser  
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Thank you for the opportunity to comment on this draft Proposed Plan.  
Should you have questions regarding our review or comments, please contact  
me at (314) 751-3176.

Sincerely,

WASTE MANAGEMENT PROGRAM



James L. Kavanaugh  
Environmental Specialist

JLK:sh

c: Mr. Brian Allen, Laboratory Services Program  
Mr. Jim Fels, Division of Geology and Land Survey  
Mr. Randy Maley, Missouri Department of Health